

2007R01019/LDV

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Freda L. Wolfson
v. : Crim. No. 09-317-01
THOMAS ASARE : 18 U.S.C. § 1029(b)(2)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

- a. Defendant Thomas Asare resided in Newark, New Jersey.
- b. Co-conspirator Edmond Mensah resided in New York.
- c. Co-conspirator Seidu Gado resided in East Orange, New Jersey.
- d. Victim M.G. resided in Kentucky.
- e. Victim D.M. resided in Ohio.

2. From in or about July 2007 through in or about January 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

THOMAS ASARE

did knowingly and with intent to defraud conspire and agree with others to produce, use, and traffic in one or more counterfeit access devices affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1029(a)(1).

Object of the Conspiracy

3. The object of the conspiracy was for defendant THOMAS ASARE, along with his co-conspirators, to steal money and other funds from thousands of victims of identity theft by obtaining personal information of those victims and, thereafter, using that information to open accounts with banks, credit card companies, credit unions, and brokerage firms in the names of those victims, or, alternatively, to alter the existing accounts held by those victims.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that co-conspirator Edmond Mensah and others, using various e-mail addresses, would send and receive personal information concerning thousands of victims of identity theft, many of whom were from states other than the State of New Jersey, to known and unknown co-conspirators. That personal information, included, among other things, bank account numbers, Social Security numbers, credit card numbers, and home addresses.

5. It was further part of the conspiracy that co-conspirator Edmond Mensah, along with others, would use the personal information of the identity theft victims to open new accounts with banks, credit card companies, and brokerage firms in the names of those victims, or, alternatively, they would alter existing accounts held by those victims.

6. It was further part of the conspiracy that when new accounts were opened in the victims' names or existing accounts altered, the home addresses for defendant THOMAS ASARE and other co-conspirators would be used on the accounts. Accordingly, mail associated with those accounts, including credit cards and bank cards, would be delivered to defendant THOMAS ASARE and other co-conspirators. Defendant THOMAS ASARE and other co-

conspirators would, in turn, deliver the fraudulently obtained mail to co-conspirator Edmond Mensah.

7. It was further part of the conspiracy that co-conspirator Edmond Mensah and others, after coming into possession of the fraudulently obtained mail, would use the contents of the mail, such as credit cards and bank cards, to withdraw money and other funds from the accounts held in the victims' names.


Overt Acts

8. In furtherance of this conspiracy and to effect the object thereof, the defendant THOMAS ASARE and his co-conspirators committed and caused to be committed the following overt acts, among others, within the District of New Jersey, and elsewhere:

a. On or about August 22, 2007, two first class mailings from Capital One – one addressed to M.G. that included a credit card with a line of credit of \$20,500 in the name of M.G. and a second addressed to D.M. that included a credit card with a line of credit of \$7,000 in the name of D.M. – were sent to defendant THOMAS ASARE's home in Newark, New Jersey.

b. On or about September 18, 2007, defendant THOMAS ASARE, along with co-conspirator Seidu Gado, provided co-conspirator Edmond Mensah with fraudulently obtained mail.

All in violation of Title 18, United States Code, Section 1029(b)(2).


RALPH J. MARRA, JR.
Acting United States Attorney

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UNITED STATES OF AMERICA

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INFORMATION FOR

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